

**U.S. DOT Memorandum**

Subject: Request for Guidance for Determining  
The Proper Environmental Document  
When Assessing the Impacts to Historic Bridges

From: Jeffrey N. Shone  
Deputy Assistant Secretary for Policy  
and International Affairs

To: Captain J. M. Seabrooke, Chief  
Bridge Administration Division  
United States Coast Guard

Date: June 18, 1984

This memorandum is in response to your request for comments concerning the appropriateness of an environmental assessment as the NEPA document for determining the environmental impact resulting from destruction of a property listed in the National Register of Historic Places (NRHP). The particular property in question is the U.S. Route 2 Bridge across the Pend Oreille River, mile 88.2 at Newport, Idaho.

Neither your memorandum nor our informal discussions with Coast Guard and CHIN staff have provided detailed information about the project. Consequently, the following guidance is necessarily based on general policy considerations.

An environmental assessment and Finding of No Significant Impact would ordinarily not be adequate compliance with NEPA for a project entailing demolition of a bridge listed on the National Register. As your memorandum indicates, DOT Order 5610.1C calls for the preparation of an environmental impact statement when a property protected by Section 4(f) of the DOT Act is more than minimally affected by an action. The demolition of a bridge listed in the NRHP is certainly more than a minimal effect and ordinarily warrants the preparation of an environmental impact statement.

Similarly the Council on Environmental Quality regulations on implementation of NEPA specifically cite effects on National Register sites as a factor in determining the significance of a project's impact, with the clear implication that destruction of such a site would be a significant impact, thus requiring an EIS.

There may be mitigating factors which would change the normal processing requirements in individual cases. For example, a state may have completed an inventory of its historic bridges, and adopted a bridge preservation plan (as Ohio has done). Demolition

of a listed bridge which is not considered important for preservation under such a plan could be viewed as having minimal impact on a Section 4(f) site, and thus not require an EIS. In the absence of such factors, however, the presumption is that an EIS is needed.

Should you desire, we are available to discuss this matter further with you at a mutually convenient time. The General Counsels Office concurs in this memorandum.